

**Bernard  
Grossberg**  
Attorney at Law

38 Green Street  
Milton, Massachusetts 02186  
(617) 737-8558  
Fax (617) 364-5646  
bgrossberg@grossberglaw.com

December 8, 2020

Eugenia Carris, Esq.  
Assistant United States Attorney  
Office of the United States Attorney  
U.S. Courthouse, Suite 9200  
1 Courthouse Way  
Boston, MA 02210

Re: **United States v. Shawn Herron**  
**Criminal No. 1:20-CR-10145-FDS**

Dear Ms. Carris:

As you may recall, I represent the defendant, Shawn Herron, in the above-entitled matter. As of this date, I still have not received a thumb drive or other device containing the documents, texts, etc. downloaded from the defendant's personal cell phone and work cell phone and computer. Consequently, I do not believe that the automatic discovery process required by Rule 116.1 of the Local Rules, is complete. Moreover, the defendant has not filed a waiver of request for disclosure. While I await receipt of the thumb drive, in accordance with Local Rule 116.3, I would greatly appreciate it if you would furnish me with the following additional discovery materials:

- The precise name, if there is any other name of the Fall River Post Office.
- The zip codes of the areas for which the Fall River Post Office receives and distributes mail.
- The names and present addresses of all person's employed at the Fall River Post Office from in or about September, 2018 through in or about February, 2020.
- The specific name of the position that the defendant held at the Fall River Post Office from in or about September, 2018 through and about February, 2020.

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- Any and all written job description or other descriptions of the position that the defendant held at the Fall River Post Office from in or about September, 2018 through in and about February, 2020.
- Any and all reports or other written documents regarding or pertaining in any way to evaluations, assessments or reviews of the defendant's job performance conducted by the Postal Service or by any other governmental agency in regard to the defendant's work at the Fall River Post Office.
- The number of items received by the Fall River Post Office, including letters, envelopes and parcels, for delivery, from in on or about September, 2018 through in or about February, 2020.
- The number of parcels received by the Fall River Post office, for delivery from on or about September 2018 through February 2020, which were reported or otherwise recorded as missing and/or not delivered to the listed recipient
- A description of the procedure and device utilized to "scan" items that were received by the Fall River Post Office from in or about September, 2018, through February, 2020.
- A description of the procedure and device utilized to "scan" items that were distributed by the Fall River Post Office from in or about September, 2018 through February, 2020.
- A description of the video cameras utilized in the Fall River Post Office, including their respective locations and intended sight views from in or about September, 2018 through February 2020.
- Copies of any and all surveillance videos of the defendant in the Fall River Post Office from in or about September, 2018 through February, 2020.
- A description of the procedure and device by which an employee, including the defendant, signs in and out of work at the Fall River Post Office from in or about September, 2018 through February, 2020.
- Copies of any and all time records or reports compiled by the device by which employees, including the defendant, sign in and out of work at the Fall River Post Office from in or about September, 2018 through February, 2020.



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- Copies of reports regarding and/or copies of statements made by or attributed to any and all persons to be called as witnesses at trial and/or who were interviewed by postal inspectors regarding the charges herein.
- Any and all information known to the government or by the exercise of due diligence can be ascertained by the government of statements of promises, inducements or rewards of any kind or nature made to any and all witness or witnesses.
- Copies of the complete criminal records of any and all person or persons to be called as witnesses at trial and/or who were interviewed by Postal Inspectors regarding the charges herein.
- Copies of any and all photographs and photographic arrays shown or exhibited to a person or persons to be called as witnesses at trial and/or who were interviewed by Postal Inspectors regarding the charges herein.
- Copies of reports regarding or describing any and all scientific or forensic tests performed by the government or its agents or any and all evidence involved in this matter, regardless of whether or not the governments intends to introduce such evidence at trial, including, but not limited to, the scientific name of any such test, the date the test was performed, the name of the person who performed the test and his or her qualifications, the nature of the evidence on which the test was performed, the results of the test and the opinion, if any, of the person who performed the test regarding the test or results of the test.
- Any and all facts, whether written or not, which are in the possession, custody or control of the government or by the exercise of due diligence can be ascertained, which indicate, infer or otherwise state, that a person or persons other the defendant committed the offenses involved herein.
- A list of all evidence in the possession, custody or control of the government which the government intends to rely on and/or to introduce in evidence at trial or which relates in any way to the charges involved herein.

I sincerely appreciate your assistance. Thank you.

Sincerely,

Bernard Grossberg

BG/cam

cc: Shawn Herron